

FILED

MAY 26 2015

Clerk, U.S. District Court
Eastern District of Tennessee
At Chattanooga

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF
TENNESSEE AT WINCHESTER

TODD SCRUGGS

vs.

BEDFORD COUNTY JAIL

PETITION FOR REDRESS OF
GRIEVANCES AND REQUEST
FOR JURY TRIAL

4:15-CV-29

Mattie Carter

Now comes Todd Scruggs, hereafter "Plaintiff", and submits this as formal complaint against the Bedford County Jail, hereafter "Defendant", located in Shelbyville, Tennessee, and requests a jury trial, in this case, based upon the following reasons:

OVERCROWDING AND INADEQUATE FACILITY

Plaintiff is currently incarcerated at Defendant's location.

upon admission to Defendant's correctional facility, Plaintiff was issued an unreasonably thin sheet of plastic, with no cushion at all, which Defendant's staff referred to as a "mattress". Plaintiff was then forced to sleep on a filthy area of flooring for an indeterminate period of time.

Furthermore, Plaintiff was not issued proper hygiene items to which he could use to bath and properly cleanse his body, which had become extraordinarily

unclean, due to him being forced to sleep and live on an area of flooring which was not properly maintained by Defendants staff.

Due to this deficiency, Plaintiff developed rashes and lesions of the skin; back, neck and spinal issues, which still persist and have not since subsided.

INADEQUATE / DENIAL OF MEDICAL

Plaintiff has made multiple attempts to have Defendant provide medical diagnosis and relief, for aforementioned medical issues, to no avail. Defendants staff either ignores or denies Plaintiff's pleas for proper medical facilitation to the detriment of Plaintiff.

Defendants staff exhibits a complete disregard for human life and a healthy inhabitation for human beings.

UNHEALTHY LIVING CONDITIONS

Plaintiff asserts that unidentifiable dusts, molds, fungi, bacteria, viruses and rusts infest Defendants facility and that Defendant is aware of these issues but makes no attempt to correct them.

Plaintiff is unable to ascertain exactly how detrimental his long term exposure to these objectionable

conditions, has impacted him due to aforementioned denial of medical assessment and inadequate medical facility.

DISCRIMINATION FAVORITISM AND RACISM

Plaintiff asserts that defendant regularly engages in acts of favoritism, discrimination and prejudice based solely upon race and/or ethnicity, against Plaintiff.

INADEQUATE NUTRITION

Plaintiff asserts that defendant refuses to provide adequate sustenance to maintain healthy human brain and body function(s), sometimes less than 1,000 calories per day, to the detriment of inmates and plaintiff.

OTHER DEFICIENCIES

The deficiencies and harmful inadequacies at Defendant's location are innumerable, and overwhelming to list, and/or marshal, without the assistance of a legal expert or professional. Accordingly, Plaintiff humbly requests that the right to bring forward those accusations be reserved for the future.

INDIGENT

Plaintiff asserts that he is indigent and unable to pay the filing fees in this case. Accordingly,

Plaintiff has included documentation to proceed
"In forma pauperis".

Unfortunately, Defendant willfully refuses to
issue Plaintiff's record of account, for the last six
months, and Plaintiff humbly requests that this court
order Defendant to provide said information to
Plaintiff, or the court, so that Plaintiff may move
forward in this case.

Furthermore, Plaintiff humbly requests that
an attorney be appointed to represent him in this case.

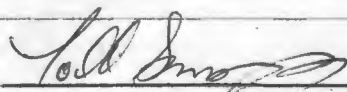
RELIEF

Due to physical pain and suffering, emotional
distress, mental anguish and psychological trauma,
Plaintiff is seeking relief in the amount of
\$1,500,000.00 upon a favorable finding by a jury.

CONCLUSION

Wherefore, due to the foregoing reasons, Plaintiff humbly
requests this court's assistance and a jury trial in this
matter.

Respectfully Submitted.



TODD SCRUMS
210 N. SPRING STREET
SHELBYVILLE, TN 37160

NASHVILLE TN 370

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CLERK OF COURT
UNITED STATES DISTRICT COURT
CHATTANOOGA DIVISION
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